GEORTO, INC. v. WILLIAM GATEMAN v. ROBERTS CORPORATION, U.S. DIST. COURT, MASS., CIVIL ACTION NO: CV-04-11730-NG

JOINT EXHIBIT LIST

| Trial | | | | | | |
|---------|--|-------------|--------------------------|-------------------------|-----------|-----------|
| Exhibit | | | | Sponsoring | Objection | Objection |
| Number | | Date | Bates No. Range | Party | By | Basis |
| | Agreed Exhibits To Be Admitted As | | | | | |
| | | | | | | |
| - | Stipulated facts | | | JOINT | | |
| | Selected Site Plans / Schematics / Maps, | | | | | |
| | including but not limited to selected deposition | | | GEO-1A / | | |
| 2 | exhibits. | | | GAT-4 | | |
| | Photographs of property, including selected | | | | | |
| | deposition exhibits, photos in reports, photos | | | GEO-1B/ | | |
| က | produced by Family Dollar. | | | GAT-5 | | |
| | Declaration of Trust Establishing 200 Union | | | | | |
| 4 | Street Realty Trust | 12/18/1996 | | GEO-1G | | |
| | Deed of Purchase of Union Street Property by | | | GAT-12/ | | |
| 2 | William Gateman | 12/18/1996 | | ROB-12 | | |
| | Selected documents from City of Lynn Building | | | | | |
| 9 | Department file re property | | | GEO-2V | | |
| | Demolition Permit dated October 9, 2001 | 10/9/2001 | 8090d | GE0-1L | | |
| | Letter dated March 4, 2002 from Francis Calnan | | | | | |
| 8 | to William Gateman | 3/4/2002 | | GEO-1M | | |
| | Roberts-Gateman contract dated March 12, | | | GEO-1N / GAT-2 / ROB | | |
| თ | 2002 | 3/12/2002 | ROB000069 | 1 | | |
| 10 | Demolition Applications | 3/14/2002 | ROB000009 - ROB000012 | GEO-24 | | |
| 2 | ROB-9 Roberts Cornoration's Invoice | | ROB000070 - | | | |
| | Accounting Records, and Receipt Payment | | ROB000079: | GEO-10 / | | |
| | Regarding Demolition of 200 Union Street, | 3/12/2002 - | ROB000083 - | ROB-9 / GAT | | |
| 7 | Lynn, MA | 7/1/2002 | ROB000088 | 6 | | |

| ROB000008 ROB000039 - ROB000051 |
|--|
| ROB000051 ROB000036 - ROB000038; |
| ROB000052 - ROB000067; ROB000080 - |
| - ROBOOO17 - |
| ROB000035 |
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| P0454 - P0472 |
| 1 |
| P0680 |
| |
| P0691 - P0716 |
| P0327 - P0343 |
| |

| 96 | Trustee's Certificate dated February 9 2004 | 2/9/2004 | | GEO-1F | |
|----|--|------------|--|----------|-------------|
| | Indemnification Agreement dated February 9, | | | | |
| 27 | 2004 | 2/9/2004 | | GEO1-F | |
| | GEC Reliance Letter to KeyBank in care of | | | | |
| 78 | James Hawkins dated February 11, 2004 | 2/11/2004 | P0741 - P0752 | GEC-1J | |
| 29 | KeyBank loan closing documents | 2/19/2004 | P1466 - P1595 | GEO-2M | |
| | Quitclaim Deed of Purchase of Union Street | | | GEO-1D / | |
| | Property by Georto, Inc.recorded February 20, | | | GAT-10 / | |
| 30 | 2004 | 2/20/2004 | | ROB-10 | |
| | Demand letter to Gateman from D. Kerester | | | | |
| 31 | dated April 26, 2004 | 4/26/2004 | P0986 - P0987 | GEO-1R | |
| | Proposals submitted to PM Construction for | | | | - |
| 32 | Removal of Debris | 5/1/2004 | | GE02Q | |
| | Letter dated May 6, 2004 from PM to James | | | | |
| 33 | Hawkins and enclosures | 5/6/2004 | | GEO-2R | |
| | Comminications from PM to George regarding | | P0049 - P0061. | | |
| 34 | change order for removal of demolition debris | | P0021 - P0029 | GEO-2S | |
| | Change Order / work authorization for removal | 6/21/2004; | | | |
| 35 | of demolition debris | 6/7/2004 | | GEO-1P | |
| | Georto check to PM Construction for removal of | | The same of the sa | | |
| 36 | debris per change order | 7/10/2004 | P0048 | GE0-1Q | |
| | Selected PM construction documents (costs, | | | | |
| | application for payment, payments, | | | | |
| | subcontractor change orders, subcontractor | | | | |
| 37 | invoices, etc.) | | | GEO-2T | |
| | Letter from Jack Anetakis to Gateman dated | | | | |
| 38 | September 13, 2004 | 9/13/2004 | | GEO-1T | |
| | S.W. Cole Geotechnical Engineering Evaluation | | | | |
| 39 | dated May 13, 2004 | 5/13/2004 | P0876 - P0892 | GEO-1S | |
| | Supplemental S.W. Cole report dated | | | | |
| 40 | December 20, 2005 | 12/20/2005 | | GEO-1S | |
| | Solid Waste Report of Gregory C. Wirsen, MSc, | | | | |
| 41 | dated December 28, 2005 | 12/28/2005 | | GEO-1S | |
| | ROB-13. Documents concerning Insurance | | | | |
| 42 | Proceeds Received by William Gateman for Illnion Street Property | | | POB 13 | |
| 1 | Gillon Green Topons | | | 21-001 | |

| | Potential Exhibits That May Be Offered/Introduced by Sponsoring Party | | | | | |
|---|--|------------------|--|-------------------|-----------|--|
| | | | | | | |
| В | Lauren McKinlay site inspection / interview notes | 5/2/2002 | GEC001 - GEC008 | GEO-2B | | |
| q | Hawkins/Gateman Letter of Intent | 3/20/2003 | | GEO-2H | | |
| O | Fax from James Hawkins to Phillip Morin dated December 17, 2003 | 12/17/2003 | P0771 - P0796 | GEP-2i | | |
| ď | Thomas Mattuchio invoices and corresponding trucking/disposal slips, summaries, etc. | | P0161 - P0293; P0030 - P0047 | GEO-2U | | |
| Φ | Selected communications from Clay Collins | | P1457; P1459 - P1461; P1411; P1428 - P1437; P1616 - P1625 | GEO-2G | | |
| f | Selected documents from the City of Lynn Fire Department re property | | | GEO-2W | | The state of the s |
| g | Selected documents from Mass. Department of Environmental Protection re property | | | GEO-2X | | |
| h | Bank Records of William Gateman concerning Union Street Property | | | ROB-14 | | |
| | | | | | | |
| | Disputed Exhibits | | | | | |
| | | | | | | |
| A | Roberts Corporation's Notes of Appointments and Phonecalls | | ROB000001 - ROB000005 | GEO-2F / ROB-5 | GAT | |
| В | Notes of Steve McIntyre and Richard Pearle of PM | 4/5/04 - 4/14/04 | P0474 - P0475 | GEO-2P | GAT / ROB | Hearsay |

| | | | P0480 - P0481; | | | |
|---|--|-----------|--|---------|------------------------------|---------|
| ပ | Contemporaneous notes of James Hawkins | 4/14/2004 | P0476 - P0477 | GE0-20 | GEO-20 GAT / ROB Hearsay | Hearsay |
| | Documents regarding property taxes owed by | | The State of the S | GE0-1U/ | | |
| ۵ | Gateman | 8/26/2004 | P09893 - P0899 | ROB-15 | GAT | |
| Ш | Handwritten notations re proceeds | 8/30/2005 | | GEO-1V | GAT | |